

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 15-20652-1

Case No. 20-20187

vs.

HON. GEORGE CARAM STEEH

D-1 BILLY ARNOLD,

Defendant.

/

---

AMENDED ORDER DENYING COUNSEL'S  
MOTION TO WITHDRAW (ECF No. 1906)

This matter is before the court on the motion to withdraw as counsel filed by Maria Mannarino, appointed counsel for defendant Billy Arnold. Ms. Mannarino's motion is based on defendant's request to terminate her representation, as described in a letter he wrote to the court. The court heard from all interested parties in a hearing held on March 28, 2023. After hearing from Mr. Arnold, Ms. Mannarino, and defense counsel Eric Koselke, the court considered the factors set forth by the Sixth Circuit in *United States v. Jennings*, 83 F.3d 145 (6<sup>th</sup> Cir. 1996). The court concludes that the four *Jennings* factors weigh in favor of denying Ms. Mannarino's motion to withdraw, as well as defendant's request to terminate Ms. Mannarino as counsel.

Now, therefore, for the reasons stated on the record,

IT IS HEREBY ORDERED that counsel's motion to withdraw (ECF No. 1906) is DENIED.

It is so ordered.

Dated: April 5, 2023

s/George Caram Steeh  
GEORGE CARAM STEEH  
UNITED STATES DISTRICT JUDGE